

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of DHL Express Mail)
parcel with tracking label number 1744007904) Case No. 2:24-MJ-2020
)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 549	Removing Goods from Customs Custody
18 U.S.C. § 371	Conspiracy
18 U.S.C. § 545	Smuggling Goods into the United States
18 U.S.C. § 542	Entry of Goods by Means of False Statements

The application is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (*give exact ending date if more than 30 days: _____*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Martina Doino, HSI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: _____

Judge's signature

City and state: Los Angeles, CA

The Hon. Maria A. Audero, Magistrate Judge

Printed name and title

AUSA: Colin Scott (x3159)

ATTACHMENT A

PARCELS TO BE SEARCHED

The following one Dalsey, Hillblom and Lynn ("DHL") parcel, (the "**SUBJECT PARCEL**"), detained on March 22, 2024, from Los Angeles, California, and currently in the custody of Homeland Security Investigations ("HSI") Los Angeles field office located on 501 West Ocean Blvd, Suite 7200, Long Beach, CA 90802.

a. **SUBJECT PARCEL** is DHL Express Mail parcel with tracking label number 1744007904, weighing approximately half a pound, with a listed return address of "Shanghai Xiangding International FR, Warehouse 1, Building B Number 58, La Shanghai, China 201700" and a delivery address of "Jimmy LI, 17895 Lone Ranger Trail, Chino Hills, CA, 91709."

ATTACHMENT B

ITEMS TO BE SEIZED

The following items are to be seized from the **SUBJECT** **PARCEL** described in Attachment A, which constitute evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 549 (Removing Goods from Customs Custody); 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 545 (Smuggling Goods into the United States); and 18 U.S.C. § 542 (Entry of Goods by Means of False Statements) (the "SUBJECT OFFENSES"):

- a. Any cloned seals;
- c. Any associated packaging materials.

AFFIDAVIT

I, Martina Doino, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security ("DHS"). Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"), and have been so employed since December 2019.

2. I attended the HSI Criminal Investigator Training Program at the Federal Law Enforcement Training Center ("FLETC"), in Glynco, Georgia. At FLETC, I received training in conducting criminal investigations into customs violations such as general smuggling, narcotics smuggling, interdiction, and distribution of controlled substances.

3. I am currently assigned to the Los Angeles Border Enforcement Security Taskforce ("LA BEST") in Los Angeles, California, and have been so assigned since August 2021. LA BEST is a multiagency task force aimed at identifying, targeting, and eliminating vulnerabilities to the security of the United States related to the Los Angeles/Long Beach seaport complex, as well as the surrounding transportation and maritime corridors. My responsibilities include the investigation of violations of federal criminal laws, including crimes involving money laundering, narcotics trafficking, smuggling, fraud, and immigration violations.

4. Prior to my tenure as a special agent, I was a police officer in Key Biscayne, Florida from February 2015 to May 2019.

From July 2018 to May 2019, I was a Task Force Officer ("TFO") on a High Intensity Drug Trafficking Area Task Force, where I participated in investigations into money laundering and drug trafficking crimes in South Florida. Throughout my law enforcement career, I have participated in numerous criminal investigations involving narcotics importation, exportation or distribution. Through these investigations, I am familiar with the methods and practices of drug users, drug traffickers, and drug manufacturers. I have also spoken at length with other HSI SAs and local law enforcement officers regarding methods of drug trafficking.

5. During the course of my duties, I have become familiar with the manner in which controlled substances are packaged, marketed, and consumed. During the course of my current duties, I have become familiar with the ordinary meaning of controlled substance slang and jargon, and I am familiar with the manners and techniques of traffickers in controlled substances as practiced locally. As a law enforcement officer, I have participated in numerous investigations involving drug trafficking organizations. Pursuant to my participation in those investigations, I have performed various tasks which include, but are not limited to: (a) functioning as a case agent, which entails the supervision of specific investigations involving the trafficking of drugs and the laundering of monetary instruments; (b) functioning as a surveillance agent and thereby observing and recording movements of persons trafficking in drugs and those suspected of trafficking drugs; (c) interviewing

witnesses, cooperating individuals, and informants relative to the illegal trafficking of drugs and the distribution of monies and assets derived from the illegal trafficking of drugs (laundering of monetary instruments); (d) participating in the tracing of monies and assets gained by drug traffickers from the illegal sale of drugs (laundering of monetary instruments); and (e) participating in investigations involving the purchase of controlled substances, the execution of search warrants, surveillance in connection with narcotic investigations, and the interview of confidential sources.

6. Through my investigations, my training and experience, and discussions with other law enforcement personnel, I have become familiar with the tactics and methods employed by controlled substance traffickers to smuggle and safeguard-controlled substances, distribute controlled substances, and collect and launder the proceeds from the sale of controlled substances. These methods include, but are not limited to, the use of wireless communications technology, such as cellular telephones and prepaid cellular accounts; counter surveillance; false or fictitious identities; and coded or vague communications in an attempt to avoid detection by law enforcement.

II. PURPOSE OF AFFIDAVIT

7. This affidavit is made in support of an application for a warrant to search the following parcel (the "**SUBJECT PARCEL**"), as described more fully in Attachment A, which were shipped through Dalsey, Hillblom and Lynn ("DHL") and are

currently in the custody of Homeland Security Investigations (HSI) in Los Angeles, California:

a. A DHL parcel with tracking number 1744007904 (the "**SUBJECT PARCEL**");

8. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 549 (Removing Goods from Customs Custody); 18 U.S.C. § 371 (Conspiracy), 18 U.S.C. § 545 (Smuggling Goods into the United States); and 18 U.S.C. § 542 (Entry of Goods by Means of False Statements) (the "**SUBJECT OFFENSES**"), as described more fully in Attachment B. Attachments A and B are incorporated by reference.

9. The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically noted otherwise, all conversations and statements described in this affidavit are provided in substance and in part only.

III. SUMMARY OF PROBABLE CAUSE

10. On March 22, 2024, at the DHL Processing and Distribution Center in Los Angeles County, California, I and other Law Enforcement Officers found the **SUBJECT PARCEL** after being alerted by Customs and Border Protection ("CBP") that it had arrived from the DHL Cincinnati, Ohio Hub.

11. The **SUBJECT PARCEL** was targeted by HSI due to its recipient address which has been tied to several smuggling events at the port of Long Beach in which shipping containers' unique seals have been tampered with or cloned. The subject package was x-rayed by CBP officers, and the image is consistent with the shape of a container seal. The **SUBJECT PARCELS** are therefore believed to contain a counterfeit or cloned container seal.

IV. STATEMENT OF PROBABLE CAUSE

12. Based on my training and experience, my conversations with other law enforcement officers who specialize in smuggling investigations, my review of law enforcement reports, and my own participation in this investigation, I know the follow:

A. Background on Use of Mail for the Cloned Seal Smuggling Scheme.

13. Based on my knowledge of the investigation, I know that HSI has been investigating the cloned seal smuggling scheme effecting maritime cargo at the Port of Long Beach, California since February 2023.

14. Based on law enforcement reports, I know that CBP initially discovered that cargo was missing from a container that had just arrived from China, and that the missing cargo was replaced, or swapped, with cargo that had already undergone inspection in the United States.

15. CBP has uncovered close to 100 incidents of "cargo swapping" in which containers are arriving at the CBP inspection sites with tampered seals and markings that indicate that the

goods in the container have actually already been inspected at a CBP facility on an earlier date.

16. HSI began targeting international mail parcels destined to known targets of the investigation in the Los Angeles area.

17. Since March 2023, HSI has intercepted approximately 10 parcels containing cloned container seals. The seals are exact replicas of container seals affixed to international freight containers in route to the United States from China.

B. Initial Investigation of the SUBJECT PARCEL

18. On March 21, 2024, HSI was alerted about the **SUBJECT PARCEL's** arrival at the DHL international mail facility in Cincinnati, Ohio. The **SUBJECT PARCEL** was manifested as "Lock Lock" and originated from China.

19. On March 22, 2024, the **SUBJECT PARCEL** subsequently cleared customs and was shipped to the DHL Los Angeles Facility for final distribution.

20. HSI requested CBP hold the **SUBJECT PARCEL** at the DHL Los Angeles facility and conduct an X-Ray examination.

21. I reviewed reports generated from law enforcement databases to check the sender information listed on the **SUBJECT PARCEL** and determined the following:

a. The **SUBJECT PARCEL** is DHL Express Mail parcel with tracking label number 1744007904, weighing approximately half a pound, with a listed return address of "Shanghai Xiangding International FR, Warehouse 1, Building B Number 58,

La Shanghai, China 201700" and a delivery address of "Jimmy LI, 17895 Lone Ranger Trail, Chino Hills, CA, 91709."

b. The recipient of the **SUBJECT PARCEL** is Jimmy LI also known as Jinning LI, who I know, based upon my knowledge of the investigation, has been involved in several swapped cargo events occurring between January through March 2024.

c. The weight of the **SUBJECT PARCEL** is consistent with other parcels intercepted by HSI that contained cloned container seals.

d. The X-Ray images of the **SUBJECT PARCEL** show multiple objects that appear to be one container seal, a locket set and a pair of keys.

22. HSI is seeking to open the **SUBJECT PARCEL** and identify the container that the cloned seal belongs to. This would allow HSI to place the incoming container on a CBP hold and prevent its contents from being smuggled into the United States.

V. CONCLUSION

23. For the reasons set forth above, there is probable cause to believe that the items listed in Attachment B, which constitute the evidence, fruits, and instrumentalities of the

SUBJECT OFFENSES, will be found in the SUBJECT PARCELS, as described in Attachment A.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 5th day of
April, 2024.

HONORABLE MARIA A. AUDERO
UNITED STATES MAGISTRATE JUDGE